

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

TENNESSEE CONFERENCE of the NATIONAL  
ASSOCIATION for the ADVANCEMENT of  
COLORED PEOPLE, et al.,

Plaintiffs,

v.

WILLIAM LEE, in his official capacity as Governor of  
the State of Tennessee, et al.,

Defendants.

Civil No. 3:20-cv-01039

JUDGE CAMPBELL  
MAGISTRATE JUDGE  
FRENSLEY

[Class Action]

**JOINT STATUS REPORT**

The parties have yet to agree upon proposed trial dates but are scheduled to meet and confer this week regarding their positions on outstanding discovery disputes. During that conference, the parties will discuss trial dates, and thereafter apprise the Court of the dates they have agreed upon.

Dated: October 30, 2023

Keeda Haynes, BPR No. 031518  
Free Hearts  
2013 25th Ave. N,  
Nashville, TN 37208  
(615) 479-5530  
[keeda@freeheartsorg.com](mailto:keeda@freeheartsorg.com)

Phil Telfeyan  
Natasha  
Baker\*  
Equal Justice Under Law  
400 7th St. NW, Suite 602  
Washington, D.C. 20004  
(202) 505-2058  
[ptelfeyan@equaljusticeunderlaw.org](mailto:ptelfeyan@equaljusticeunderlaw.org)

Respectfully submitted,

Blair Bowie\*  
Danielle Lang\*  
Alice C. Huling\*  
Valencia Richardson\*  
Aseem Mulji\*  
Ellen Boettcher\*  
Kate Uyeda, BPR No. 040531  
Campaign Legal Center  
1101 14th St. NW, Suite 400  
Washington, DC 20005  
(202)-736-2200  
[Bbowie@campaignlegal.org](mailto:Bbowie@campaignlegal.org)  
[Dlang@campaignlegal.org](mailto:Dlang@campaignlegal.org)  
[Ahuling@campaignlegal.org](mailto:Ahuling@campaignlegal.org)  
[VRichardson@campaignlegal.org](mailto:VRichardson@campaignlegal.org)

[nbaker@equaljusticeunderlaw.org](mailto:nbaker@equaljusticeunderlaw.org)

\* Admitted pro hac vice

[Amulji@campaignlegal.org](mailto:Amulji@campaignlegal.org)  
[EBoettcher@campaignlegal.org](mailto:EBoettcher@campaignlegal.org)  
[KUyeda@campaignlegal.org](mailto:KUyeda@campaignlegal.org)

/s/ Charles K. Grant  
Charles K. Grant, BPR No. 017081  
Denmark J. Grant, BPR No. 036808  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, PC  
1600 West End Avenue, Suite 2000  
Nashville, TN 37203  
Telephone: (615) 726-5600  
Facsimile: (615) 726-0464  
[cgrant@bakerdonelson.com](mailto:cgrant@bakerdonelson.com)  
[dgrant@bakerdonelson.com](mailto:dgrant@bakerdonelson.com)

*Counsel for the Petitioners-Plaintiffs and the  
Class*

JONATHAN SKRMETTI  
Attorney General and Reporter

s/ Zachary Barker  
ZACHARY BARKER (BPR #035933)  
Assistant Attorney General  
Zachary.barker@ag.tn.gov  
P.O. Box 20207  
Nashville, Tennessee 37202  
615-741-1868  
*Counsel for the Defendants*

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2023, a copy of the foregoing **JOINT STATUS REPORT** was filed electronically. Notice of this filing will be served by operation of the Court's electronic filing system to counsel for parties below. Counsel for the parties may access these filings through the Court's electronic filing system:

DAWN JORDAN (BPR #020383)

Special Counsel

[dawn.jordan@ag.tn.gov](mailto:dawn.jordan@ag.tn.gov)

ANDREW C. COULAM (BPR 030731)

Deputy Attorney General [Andrew.](mailto:Andrew.Coulam@ag.tn.gov)

[Coulam@ag.tn.gov](mailto:Coulam@ag.tn.gov)

ZACHARY BARKER (BPR #035933)

Assistant Attorney General

[Zachary.barker@ag.tn.gov](mailto:Zachary.barker@ag.tn.gov)

PABLO A. VARELA (BPR #29436)

Assistant Attorney General

[Pablo.varela@ag.tn.gov](mailto:Pablo.varela@ag.tn.gov)

DAVID M. RUDOLPH (BPR #13402)

Senior Assistant Attorney General

[david.rudolph@ag.tn.gov](mailto:david.rudolph@ag.tn.gov)

Office of the Tennessee Attorney General

Public Interest Division

P.O. Box 20207

Nashville, TN 37202

*Attorneys for State Defendants*

/s/ Charles K. Grant

Charles K. Grant